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1	NINA F. LOCKER, State Bar No. 123838 Email: nlocker@wsgr.com						
2	STEVEN GUGGENHEIM, State Bar No. 201386 Email: sguggenheim@wsgr.com JONI OSTLER, State Bar No. 230009 Email: jostler@wsgr.com						
3							
4	WILSON SONSINI GOODRICH & ROSATI Professional Corporation						
5	650 Page Mill Road Palo Alto, CA 94304-1050						
6	Telephone: (650) 493-9300 Facsimile: (650) 565-5100						
7	, ,	nc					
8 9	Attorneys for Defendants Juniper Networks, Inc., Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla,						
10	Kenneth Levy and William R. Stensrud						
11	UNITED STATES DISTRICT COURT						
12	NORTHERN DISTRICT OF CALIFORNIA						
13	SAN JOSE DIVISION						
14	In re JUNIPER NETWORKS, INC. SECURITIES LITIGATION)	No. C06-04327-JW				
15		_{	STIPULATION AND [PROPULED] ORDER REGARDING FILING OF AMENDED				
16	This Document Relates To:)	COMPLAINT AND BRIEFING SCHEDULE				
17	ALL ACTIONS.)					
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This Stipulation is entered into by and among Lead Plaintiff the New York City Pension Funds, defendants Juniper Networks, Inc. ("Juniper"), Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth Levy and William R. Stensrud, and defendant Ernst & Young, by and through their respective attorneys of record.

WHEREAS, pursuant to the Court's order dated November 20, 2006, Lead Plaintiff filed a Consolidated Class Action Complaint on January 12, 2007, and Defendants have until March 12, 2007 within which to respond;

WHEREAS, on December 20, 2006, Juniper announced that it will restate its historical financial statements to record additional non cash charges for stock-based compensation, and intends to file restated financial statements during the first quarter of 2007 (*i.e.*, before March 31, 2007);

WHEREFORE, the parties hereby stipulate, and request the court to order, as follows:

- 1. Lead Plaintiff shall (a) file and serve an Amended Consolidated Class Action Complaint (the "Amended Complaint") within thirty (30) days after Juniper files its restated financial statements with the Securities Exchange Commission or, (b) in the alternative, notify Defendants by email if it decides not to file an Amended Complaint; and
- 2. Defendants shall file and serve their response(s) to the operative complaint within 45 days after (a) service of the Amended Complaint, or (b) receipt of email notification that Lead Plaintiff will not file an Amended Complaint.

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1	3. Lead Plaintiff will file and serve its opposition to defendants' motion(s) to dismiss 45			
2	days after filing and service of the motion to dismiss; and			
3	4. Defendants will file and serve their reply brief(s) 21 days after filing and service of			
4	the opposition.			
5	IT IS SO STIPULATED.			
6		WILSON SONSINI GOODRICH & ROSATI, P.C. NINA F. LOCKER		
7 8		STEVEN GUGGENHEIM JONI OSTLER		
9				
10	_	/s/ Joni Ostler JONI OSTLER		
11		650 Page Mill Road		
12		Palo Alto, CA 94304-1050 Telephone: 650/493-9300		
13		650/493-6811 (fax)		
14	.	Attorneys for Defendants Juniper Networks, Inc., Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert		
15		M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth Levy and William R. Stensrud		
16 17	I, Joni Ostler, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Filing of Amended Complaint and Briefing			
18	Schedule. In compliance with General Order 45, X.B., I hereby attest that David C. Harrison has concurred in this filing.			
19		NEIL L. SELINGER		
20]	RICHARD BEMPORAD DAVID C. HARRISON		
21	II .	LOWEY DANNENBERG BEMPORAD SELINGER & COHEN, P.C.		
22				
23		/s/ David C. Harrison		
24		DAVID C. HARRISON One North Broadway, 5th Floor		
25		White Plains, NY 10601-2310		
26	II .	914-733-7228 (telephone) 914-997-0035 (facsimile)		
27		Lead Counsel for Plaintiffs		
28				

STIPULATION AND [PROPOSED] ORDER REGARDING FILING OF CONSOLIDATED COMPLAINT – Case No. C06-04327

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1	WHILEME IONOWHEED			
2	WILLEM F. JONCKHEER SCHUBERT & REED LLP			
3	Two Embarcadero Center, Suite 1050 San Francisco, CA 94111			
	Telephone: 415-788-4220			
4	Local Counsel for Plaintiffs			
5	I, Joni Ostler, am the ECF user whose ID and password are being used to file this			
6	Stipulation and [Proposed] Order Regarding Filing of Amended Complaint and Briefing Schedule. In compliance with General Order 45, X.B., I hereby attest that David M. Friedman			
7	has concurred in this filing.			
8	DATED February 15, 2007 PETER A. WALD			
9	PATRICK E. GIBBS DAVID M. FRIEDMAN			
	VIVANN H. CHUI			
10	LATHAM & WATKINS LLP			
11				
12	/s/ David M. Friedman			
13	DAVID M. FRIEDMAN			
14	505 Montgomery Street, Suite 2000 San Francisco, CA 94111			
15	Telephone: 415-391-0600			
16	Counsel for Defendants Ernst & Young			
17	* * *			
18	ORDER			
19				
	James Ubse			
20	DATED:			
21	THE HONORABLE JAMES WARE UNITED STATES DISTRICT JUDGE			
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	STIPULATION AND [PROPOSED] ORDER REGARDING			